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May 19, 2023

VIA CM/ECF ONLY

Hon. Mark W. Pedersen
100 State Street
Rochester, NY 14614
pedersen@nywd.uscourts.gov

RE: **Jason Wemes v. The Canandaigua National Bank & Trust Company;**
Case No.: 6:22-cv-06297 (DGL) (MWP)

SUBJECT: **Consent Request for Adjournment of Discovery Deadlines**

Dear Magistrate Judge Pedersen:

I write on behalf of Plaintiff Jason Wemes, with the consent of counsel for Defendant, to request an enlargement of time to complete discovery. The parties have propounded and responded to written discovery, and are in the process of attempting to resolve currently-informal discovery issues before certain depositions are held.

No prior extensions of time have been previously granted. The parties seek to extend the various deadlines in the initial Scheduling Order (Dkt. No. 11) by four (4) months as follows:

Deadlines	Initial deadlines	Proposed deadlines
Factual discovery	June 2, 2023	October 6, 2023
Motions to compel discovery	July 1, 2023	November 3, 2023
Motions to join other parties and to amend the pleadings	July 7, 2023	November 10, 2024
Plaintiff's identification of expert witnesses and provision of reports	August 5, 2023	December 8, 2024
Defendant's identification of expert witnesses and provision of reports	September 5, 2023	January 5, 2024
Plaintiff's identification of rebuttal experts and provision of reports	October 5, 2023	February 9, 2024
All discovery relating to experts, including depositions	November 7, 2023	March 8, 2024
Dispositive motions	January 13, 2024	May 17, 2024

Thank you for your consideration of this request.

SO ORDERED.


Mark W. Pedersen
U.S. Magistrate Judge
May 31, 2023, Rochester, NY

Sincerely,


Gregory L. Silverman